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ATTORNEYS FOR THE HICKS DEFENDANTS¹

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re	§	
	§	
TEXAS RANGERS BASEBALL	§	Case No. 10-43400 (DML)
PARTNERS,	§	Chapter 11
Debtor	§	
	§	
RTKL ASSOCIATES,INC. and	§	
VRATSINAS CONSTRUCTION	§	
COMPANY	§	
Plaintiffs,	§	
	§	
v.	§	Adversary No. 10-4263
	§	
TEXAS RANGERS BASEBALL	§	
PARTNERS, et al. ²	§	
Defendants.	§	

¹ Arlington Devco, LLC, Arlington Interest, L.P., Ballpark Real Estate, L.P., Hicks Glorypark, LLC, Hicks Holding, LLC, HSG Partnership Holdings, LLC, Southwest Sports Realty Partners, L.P., SSR GP Interests, L.P., and SWS Realty, LLC

² Defendants are: Texas Rangers Baseball Partners; HSG Partnership Holdings LLC; Hicks Holdings LLC; Hicks Glorypark, LLC; SEC of Ohio, Inc. (d/b/a Steiner + Associates, Inc.); Ballpark Real Estate, LP; SSR GP Interests, LP; SWS Realty, LLC; Arlington Interests, LP; Arlington Devco, LLC; Southwest Sports Realty Partners, LP; Texas Rangers Baseball Partners (in its capacity as post-effective date debtor under the confirmed Fourth Amended Plan of Reorganization, by and through its plan administrator); Rangers Baseball Express LLC; and Rangers Baseball LLC.

**THE HICKS DEFENDANTS' STATEMENT PURSUANT TO
BANKRUPTCY RULE 9027(e)(3) CONCERNING REMOVAL**

Arlington Devco, LLC, Arlington Interest, L.P., Ballpark Real Estate, L.P., Hicks Glorypark, LLC, Hicks Holding, LLC, HSG Partnership Holdings, LLC, Southwest Sports Realty Partners, L.P., SSR GP Interests, L.P., and SWS Realty, LLC (collectively, the “Hicks Defendants”) file this Statement Pursuant to Bankruptcy Rule 9027(e)(3) Concerning Removal (the “Statement”) in response to the Notice of Removal (the “Notice of Removal”) filed by Rangers Baseball Express, LLC and Baseball Express LLC (the “Baseball Express Defendants”), and would show the Court as follows:

STATEMENT CONCERNING REMOVAL

1. The Hicks Defendants deny that the allegation in Paragraph 7 of the Notice of Removal that this adversary proceeding constitutes a “core proceeding” with respect to the claims against the Hicks Defendants within the meaning of 28 U.S.C. § 157.
2. The Hicks Defendants do not consent to entry of final orders or judgments by the Bankruptcy Court nor waive their right to trial by jury; further, the Hicks Defendants reserve their right to request remand or withdrawal of the reference to allow the trial of this case by jury.
3. Hicks Defendants are not required to admit or deny any other allegation in the Notice of the Removal. Nothing herein shall constitute an admission to any other allegation in the Notice of Removal.

Dated: November 22, 2010.

Respectfully submitted,

McKOOL SMITH P.C.

By: /s/ Basil A. Umari
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2010, a true and correct copy of the foregoing document has been served upon all parties to this adversary proceeding via the ECF system.

/s/ Basil A. Umari
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